U.S. Department of Justice

United States Attorney
Eastern District of New York

F.#2010R02203

271 Cadman Plaza East

Brooklyn, New York   11201

December 2, 2010

VIA ECF AND FEDEX

Kannan Sundaram, Esq.
Federal Defenders
16 Court Street, 3rd Floor
Brooklyn, New York 11241
Tel. (718) 330-1200

             Re: United States v. Lin Mun Poo
                   Criminal Docket No. 10-891 (DLI) (ALC)

Dear Mr. Sundaram:

         By this letter, the government discloses discovery
pursuant to Rule 16 of the Federal Rules of Criminal Procedure.
Please also consider this letter to be the government's request
for reciprocal discovery.

1.   Statements of the Defendant

         The defendant's post-arrest statement is enclosed and
Bates-stamped 1 to 3.

2.   Criminal History

         There is no criminal history available for the
defendant.

3.   Documents and Tangible Objects

         A hard drive containing a duplicate image of the
contents of the defendant's laptop computer, which was seized at
the time of his arrest on October 21, 2010, is enclosed. Please
contact the government if you require assistance reviewing the
contents of this drive.

4.   Reports of Examinations and Tests

         The government will comply with Fed. R. Crim. P.
16(a)(1)(F) by notifying you in a timely fashion of any

examinations or tests, such as computer forensic examinations, it intends to rely upon at trial.

5.   Expert Testimony

The government will comply with Fed. R. Crim. P. 16(a)(1)(G) by notifying you in a timely fashion of any expert the government intends to call at trial, such as experts in computer forensics, and by providing you with the expert's credentials and a summary of the expert's opinion.

6.   Brady Material

The government is unaware of any exculpatory material regarding the defendant in this case. The government is aware of and will comply with its obligation to produce exculpatory material or information under Brady v. Maryland, 373 U.S. 83 (1963).

The government will furnish the defense before trial with information or material regarding payments, promises of immunity, leniency, or preferential treatment, if any, made to prospective witnesses within the scope of Giglio v. United States, 405 U.S. 150 (1972) and Napue v. Illinois, 360 U.S. 264 (1959). The government will furnish before trial information or material regarding any prior convictions of any co-conspirator, accomplice or informant who may testify at trial for the government.

The government will also furnish before trial materials discoverable pursuant to Title 18, United States Code, Section 3500.

The Defendant's Required Disclosures

The government hereby requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, photographs, tapes, tangible objects, or copies or portions thereof, which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely upon at trial, and (2) any results of reports or physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant's possession, custody, or control, and which the defendant intends to introduce as evidence or otherwise rely upon

at trial, or which were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses whom the defendant intends to call to testify at trial. See Fed. R. Crim. P. 26.2. In order to avoid any unnecessary delay, we request that you have copies of these statements available for production to the government no later than the commencement of trial.

Finally, the government requests notice of any public authority defense under Fed. R. Crim. P. 12.3.

Sincerely,

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

 /s/ Cristina M. Posa
By: Cristina M. Posa
Melissa B. Marrus
Assistant United States Attorney
(718) 254-6668/6790

cc: Clerk of the Court (DLI) via ECF